

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N281265860

<b>FACILITY:</b> LEXAMAR CORPORATION		<b>SRN / ID:</b> N2812
<b>LOCATION:</b> 100 LEXAMAR DRIVE, BOYNE CITY		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> BOYNE CITY		<b>COUNTY:</b> CHARLEVOIX
<b>CONTACT:</b> Kelly Bellant , Environmental Engineer		<b>ACTIVITY DATE:</b> 12/27/2022
<b>STAFF:</b> David Bowman	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Onsite inspection for FY 23		
<b>RESOLVED COMPLAINTS:</b>		

On 16 December 2022 I, David Bowman MI EGLE AQD, conducted a site inspection of N2812 LexaMar Corporation, 100 Lexamar Dr, Boyne City, MI, operating under the conditions of Permit Shield of Renewable Operating Permit (ROP) MI-ROP-N2812-2015b. The site is located by traveling on M75 West 4.3 miles from US 131 and M75 Intersection in Boyne Falls, MI. Weather conditions were 30°F with winds at approximately 5 MPH from the south/south east.

I drove around the perimeter road of the plant and surrounding businesses and there was no discernable odors or VE from the stacks on the roof. The areas around the factory were orderly and no signs of spills or debris was observable. I met with Kelly Bellant, Environmental Engineer, for the inspection.

We began the tour by reviewing current day record data for EU-BCPL and EU-URSAMINOR Permanent Total Enclosure (PTE) pressure differential and Regenerative Thermal Oxidizer (RTO) temperature. The display gives a running three hour average that is monitored and allows for identification issues as they occur. The pressure and temperature were well within the operating parameters of the ROP.

Monitored item	Area	Reading	ROP Condition
PTE Pressure	EU-URSAMINOR Prime	0.0464" Water Column	EU-URSAMINOR SC III.3, EU-URSAMINOR SC III.6, SC III. 7, SC IV.3
PTE Pressure	EU-URSAMINOR Top Coat	0.0249" Water Column	EU-URSAMINOR SC III.6, SC IV.3
PTE Pressure	EU-BCPL Booth	0.0353" Water Column	EU-BCPL SCIII.3, SC IV.1
PTE Pressure	EU-BCPL Oven	0.0419" Water Column	EU-BCPL SCIII.3, SC IV.1
RTO Temp	RTO Bed A	1699°F	(EU-BCPL SC III.2, SC IV 3)(EU-URSAMINOR SC III.5, SC IV.2)

RTO Temp	RTO Bed B	1753°F	(EU-BCPL SC III.2, SC IV.3) (EU-URSAMINOR SC III.5, SC IV.2)
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All of the temperature monitoring and recording equipment is being maintained in accordance with the manufacturer's requirements (EU-BCPL SC III.4)(EU-URSAMINOR SC III.10).

#### EU-BCPL:

A walk down of EU-BCPL showed that the applicator equipment was operating properly inside the booths (SC III.7). All the exhaust filters are in an area requiring clean suit access. I reviewed the records and process for replacement of the filters and have no reason to believe that they are not in place during operations (SC III. 8). All the spent filters are crushed and disposed of to Waters Landfill by WM. WM has a process to classify the waste stream and it is reviewed with the company on a cyclical basis – currently less than every three years (SC III.9). The RTO is required to have a 0.5 second retention. This is part of the design of the RTO and there is no way to verify. Stack testing confirmed that DE of the RTO so it is inferred that the retention time is correct to design (SC IV. 2). All observed duct work flowed from the EU to RTO.

SVRTO stack height was confirmed to meet the requirements of minimum of 55' above ground level and the diameter of the opening appeared to be no more than 37" (SC VIII.1)

#### EU-URSAMINOR:

A walk down of EU-URSANMINOR showed that all waste materials are captured and stored in closed containers. There were no open containers found during the inspection at any part of the plant. The waste materials are disposed of in the same manner as described in EU-BCPL (SC III.1). All VOC/HAP containing materials are handled in a similar manner, every effort was observed being made to reduce fugitive emissions – there was little to no noticeable odors observable in the plant indicating that fugitives were being controlled (SC III. 2). All observed duct work on the line appeared to go to the RTO (SC III.4). The PTE was functioning during the operation observed (SC III.6, SC III.7, SC III.9) The amounts of material applied are controlled by electronic system that includes minimizing waste from cleaning system, recollection of waste product, and is a closed loop system (SC III.8)

Other notes: Lexamar has processed in place to recycle/reuse as much of the materials waste that they can. Due to the nature of some of the parts they cannot reuse them, but they are sent off to a secondary facility to be broken down and used by other industry. There is very little waste from the plant and all waste that is generated is properly disposed of in landfill as stated earlier in discussions about filter wastes from EU-BCPL and EU-URSAMINOR).

SV-RTO stack dimensions are listed under EU-BCPL. Stacks for SV-PRIMEOVEN appears to meet the requirements of minimum of 39' above ground and maximum diameter of 11" (SC VIII.2). SV-TOPCOATOVEN appears to meet the requirements of 39' above ground and maximum diameter of 14" (SC VIII.3).

**EU-SOLV:**

The control measures in place for capture of fugitive solvent and waste meet the requirements of SC III.1 and SC IX.1. It is a closed system where the computer controls the amount of waste and that waste is collected and returned back to the storage area for proper disposal. There was no piles of rags in the facility and all containers were covered at the time of inspection.

**FG-PPPP:**

All employees complete the chemical management training system that meets the standards of 40 CFR 63.4493 work practices) to ensure that a minimization of spills and ensure all know the proper procedures used at the plant (SC III.5). A computer control system continuously monitors the emissions and application rates of applied materials at all times. It is part of the control system as well as monitoring system for the plant (SC VI.6).

**FG-COLDCLEANERS:**

I gave source copy of the currently approved EGLE orange cold cleaner sticker. There is a single cold cleaner at the source and it is rarely used. The lid was closed and secured when inspected (SC IV.3), there is a drain area inside the lid to ensure that the parts are drained (SC IV.2), and the users ensure that they drain for a minimum of 15 seconds. There was a user manual and the proper use stickers on the sides and lid from the manufacturer. All maintenance on the cold cleaner is conducted in accordance with manufacturer's handbook (SC IV.1 and SC IV.2). The opening appears to be no more than 8 ft<sup>2</sup> (SC IV.1). All required information for the cold cleaner is filed with the cleaner and stored in a protective cover (SC VI.2). The written operating procedure is in the protective cover with the cold cleaner (SC VI.3). Due to lack of consistent use plant is in process of changing to a new more environmentally friendly material that may allow them to remove this from ROP in future.

**FG-RULE287(c):**

This area pertains to EU-BLACKOUT. SC IV.1 required exhaust system that serves the coat spraying equipment was in place at time of inspection and appeared to be working properly.

**FG-RULE290:**

This area applies to EU-ROOFBOND and EU-ASSEMBLY. Each quarterly report submitted covers the requirements of SC VI.1, SC VI.2, and SC VI.3. See MACES>reports received> for data pertaining to this requirement.

**PTI 397-94F:**

This newly issued PTI has not been incorporated into current ROP. It is written into the renewal ROP that is undergoing review. The line was not operating during the inspection. Contractors were present and construction has begun. Based upon what was installed currently I see no reason to doubt that it will meet and/or exceed the emissions requirements listed in the PTI. Once installed and fully operational the source plans to have proper testing to confirm emissions requirements of the new EU lines.

NAME DJB

DATE 1-10-23

SUPERVISOR Shane Nixon